

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

MARCELA NICOLE SAUZO VARGAS,
by and through MAYRA VARGAS RUIZ,

Plaintiff,

v.

Case No. 18-cv-272

MADISON METROPOLITAN SCHOOL DISTRICT,
JENNIFER CHEATHUM and
COMMUNITY INSURANCE CORPORATION,

Defendants.

DEFENDANTS' MOTION TO SEAL

NOW COME the Defendants, Madison Metropolitan School District, Jennifer Cheathum, and Community Insurance Corporation, by their attorneys, Axley Brynelson, LLP, by Lori M. Lubinsky and Danielle E. Baudhuin, and hereby move the Court to seal complete copies of the deposition transcripts and other exhibits filed with Defendants' Motion for Summary Judgment. The transcripts and other exhibits will be filed with the Court upon the Court entering an order granting this Motion, on the grounds that these deposition transcripts and other exhibits contain numerous references to a non-party former pupil of the Madison Metropolitan School District and such information is privileged and confidential pursuant to Wis. Stat. § 118.125.

Dated this 1st day of February, 2019.

/s/ Danielle E. Baudhuin

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